

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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TERESA GADE,
Plaintiff

v.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,
Defendant

Case No.: 2:14-cv-48

**NOTICE OF REMOVAL OF DEFENDANT STATE FARM
MUTUAL AUTOMOBILE INSURANCE COMPANY**

Pursuant to 28 U.S.C. §§ 1332(a), 1441 and 1446(b), Defendant State Farm Mutual Automobile Insurance Company ("Defendant" herein) hereby removes to the United States District Court for the District of Vermont the Chittenden Superior Court civil action entitled Teresa Gade v. State Farm Mutual Auto. Ins. Co., Docket No. 1372-12-13 Cncv. See attached Summons, Complaint and Demand for Jury Trial, Return of Service, February 13, 2014 letter from the Vermont Secretary of State to Defendant and Notice of Receipt dated February 19, 2014.

1. Jurisdiction is founded upon diversity of citizenship, 28 U.S.C. § 1332.
2. The amount in controversy alleged by Plaintiff exceeds \$75,000, exclusive of interest and costs, as Plaintiff is making a claim for the payment of UM benefits up to the limits of existing UM coverage which is in excess of \$75,000, as well as bad faith damages in an unstated amount. See, attached Complaint and Demand for Jury Trial.
3. Plaintiff is a resident of Williston, Vermont, located in Chittenden County, Vermont.

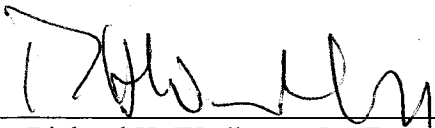
4. Defendant is an insurance company with its principal place of business in the State of Illinois.

5. Defendant submits that removal to the U.S. District Court for the District of Vermont is proper as there is diversity jurisdiction and Plaintiff has made claims in which the amount in controversy is in excess of \$75,000. See, 28 U.S.C. § 1332(a).

Dated in Burlington, Vermont, on this 11th day of March, 2014.

PIERSON WADHAMS QUINN YATES & COFFRIN, LLP
ATTORNEYS FOR DEFENDANT STATE FARM MUTUAL
AUTOMOBILE INSURANCE COMPANY

By: _____


Richard H. Wadhams, Jr., Esq.

cc: Todd D. Schlossberg, Esq., Attorney for Plaintiff
Clerk, Chittenden Superior Court